

**LEWIS BRISBOIS BISGAARD & SMITH LLP**  
JOSH COLE AICKLEN  
Nevada Bar No. 007254  
Josh.Aicklen@lewisbrisbois.com  
JEFFREY D. WINCHESTER  
Nevada Bar No. 10279  
Jeffrey.Winchester@lewisbrisbois.com  
6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
Telephone: 702.893.3383  
Facsimile: 702.893.3789  
Attorneys for SADEK BAZARAA and SADEK  
BAZARAA. LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHARONA BAICHMAN, an individual,  
  
Plaintiff,  
  
vs.  
  
SADEK BAZARAA, an individual  
Defendant.

Case No. 2:23-cv-01292

**STIPULATION TO EXTEND DISCOVERY  
AND MOTION DEADLINES  
(THIRD REQUEST)**

DEFENDANT SADEK BAZARAA, , by and through his counsel of record, the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP, and PLAINTIFF SHARONA BAICHMAN, by and through her counsel of record, WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP, agree and stipulate to extend all pending Discovery and Motion Deadlines, for good cause and/or excusable neglect (LR26-3;LR1A6-1), as follows:

(i) As detailed below, this Stipulation is made with good -cause because the complexity and ongoing treatment of Plaintiff by her health care providers, the volume of related medical records, and the pending defense medical examination of plaintiff in Las Vegas, by a California-based physician, scheduled for later this month necessitate extending the deadline for initial expert disclosures, including

1 the defense medical examination expert report, by forty five days. Moreover, the  
2 Parties have agreed to submit this matter to mediation in an effort to save the  
3 Parties' time and expenses, and to seek an early resolution of this case; however,  
4 the parties have determined that initial expert reports, including the defense  
5 medical examination report, are required for a meaningful mediation. Plaintiff has  
6 produced voluminous medical records and bills for past and ongoing medical  
7 treatment including medical records for her pre-existing 2011 neck surgery. Those  
8 voluminous records are undergoing review by the California physician retained by  
9 Defendant as part of his anticipated defense medical examination of Plaintiff. That  
10 same physician is scheduled to conduct an independent medical examination of  
11 Plaintiff on June 25th, 2024. The Parties are currently negotiating the nature and  
12 scope of said examination; however, there was excusable neglect to meet the 21  
13 day requirement for continuing an expert discovery deadline due to the logistic  
14 problems caused by the California physician's schedule and his coordination with  
15 Defense counsel to obtain a detailed summary of the Fed.R.Civ.P. 35 proposed  
16 parameters of the examination including the amount of examination time involved,  
17 and the manner, conditions, and scope of the examination. As the current initial  
18 expert disclosure deadline is July 1, 2024, the defense expert will not have sufficient  
19 time to prepare his report as an initial expert disclosure unless deadlines are  
20 extended.

21 (ii) Defendant made its Initial Disclosure of Documents and Witnesses on  
22 October 31, 2023. Defendant produced its First Supplemental Disclosure of  
23 Documents and Witnesses on December 15, 2023. Plaintiff made its Initial  
24 Disclosure of Documents and Witnesses on October 30, 2023, and produced its First  
25 Supplemental Disclosure of Documents and Witnesses on January 30, 2024.

26 (iii) The Parties have served on each other and responded to Requests for  
27 Production of Documents and Interrogatory Requests. The Parties recently  
28 resolved their dispute over medical document releases, and Defendant is in the

1 process of sending out some 19 HIPAA requests for medical records.

2 (iv) The Parties initially scheduled mediation of this matter, but Defendant  
3 asked to cancel mediation until the report on the medical document review and  
4 Defense medical examination report is prepared. This extension will allow the  
5 parties to engage in meaningful settlement mediation, as it is anticipated that the  
6 mediation will focus extensively on the Parties' expert reports.

7 (v) This Stipulation is not being filed for the purpose of undue delay or any  
8 otherwise improper purpose.

9 For good reasons shown above, and unless this Court orders otherwise, or a  
10 party moves to set aside this Order along with a proposed schedule for remaining  
11 case deadlines, **the following deadlines will be adjusted by forty-five (45) days as**  
12 **follows:**

| Scheduled Event             | Current Deadline  | Proposed Deadline  |
|-----------------------------|---|--|
| Initial Expert Disclosure   | <i>July 1, 2024</i>                                       | <i>August 15, 2024</i>                                     |
| Rebuttal Expert Disclosure  | <i>July 29, 2024</i>                                      | <i>September 12, 2024</i>                                  |
| Discovery Deadline          | <i>August 29, 2024</i>                                    | <i>October 14, 2024</i>                                    |
| Dispositive Motion Deadline | <i>September 27, 2024</i>                                 | <i>November 11, 2024</i>                                   |
| Pre-Trial Order Deadline    | <i>October 28, 2024 (unless dispositive motion filed)</i> | <i>December 12, 2024 (unless dispositive motion filed)</i> |

1 Dated this 14th day of June,  
2 2024

3 **WOLF, RIFKIN, SHAPIRO,**  
4 **SCHULMAN & RABKIN, LLP**

5  
6 Bv: /s/ *Douglas Cohen*  
7 DOUGLAS COHEN  
8 Nevada Bar No. 1214  
9 3773 Howard Hughes Pkwy.,  
10 Suite 590 South  
11 Las Vegas, Nevada 89169  
12 *Attorneys for Plaintiff*

Dated this 14th day of June,  
2024

**LEWIS BRISBOIS BISGAARD &  
SMITH LLP**

Bv: /s/ *Jeffrey D. Winchester*  
JOSH COLE AICKLEN  
Nevada Bar No. 007254  
JEFFREY D. WINCHESTER  
Nevada Bar No. 10279  
6385 S. Rainbow Boulevard,  
Suite 600  
Las Vegas, Nevada 89118  
*Attorneys for Defendant*

13 **ORDER**

14 IT IS SO ORDERED. Approved. Any future stipulations must  
15 include then existing deadlines and make showing of good  
16 cause that considerable discovery, including depositions,  
17 has been completed.  
18

19  
20 DATED this 18th day of June, 2024.

21  
22  
23  
24   
25  
26  
27  
28 UNITED STATES MAGISTRATE JUDGE